

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612

88207016

Phone: Area Code 415
464-1255



SFUND RECORDS CTR
3737-90719

AR0215

April 15, 1991
File No. 2119.1091(sfg)

Andy Lincoff
US Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: Feasibility Study Report for the United Heckathorn Site

Dear Andy:

Staff of the Regional Water Quality Control Board (RB) have reviewed the subject document prepared by Levine-Fricke and dated January 11, 1991. We have concerns pertaining to Section 2.2 "Applicable or Relevant and Appropriate Requirements" (ARAR) and to Section 3.0 "Screening of Technologies."

With respect to surface water quality objectives (Section 2.2.2.2), we would like to clarify that the Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) should be evaluated as an ARAR. Although numeric standards for the indicator chemicals for the site have not been established, current and beneficial uses of the adjacent Bay waters must be evaluated and considered in this process. This includes any potential migration and effects of polluted ground water to surface waters, whether or not the ground water quality meets drinking water criteria.

Section 2.2.5.2 has identified the State Water Resources Control Board Resolution (SWRCB) 68-16 "Statement of Policy with Respect to Maintaining High Quality Waters in California" as a To-Be-Considered requirement. For protection of surface and ground waters, this policy meets the definition of an ARAR (SWRCB memo dated July 30, 1990) and must be evaluated as such.

Additionally, we find that initial screening of some of the technologies outlined in Section 3.0 is incomplete in terms of evaluation for effectiveness and implementability. We recommend an in-depth effort be made to screen technologies and provide clear justification as to why they may or may not meet the criteria.

Finally, we would also like to point out that ground water investigation for this site is incomplete. Previous ground water data was collected during the 1983 to 1986 investigation phases and tDDT was detected in the ppb range in at least nine wells, as were several VOCs. The wells could not be located for resampling during the October 1989 upland sampling effort. We feel that current

ground water data is important to the overall evaluation of remedial alternatives; the Regional Board may also require long term ground water monitoring to measure the effectiveness of remediation.

Please call me if you have any questions regarding these comments. I can be reached at 415-464-0840.

Sincerely,

A handwritten signature in cursive script that reads "Susan Gladstone".

Susan Gladstone
Environmental Specialist
Toxics Cleanup Division